

1 BRIAN E. LUNT, ESQ.

Nevada Bar No. 11189

2 **EDWARD M. BERNSTEIN & ASSOCIATES**

3 500 South Fourth Street

Las Vegas, Nevada 89101

4 Tel.: (702) 471-5624

Fax: (702) 385-4640

5 E-Mail: blunt@edbernstein.com

6 *Attorney for Plaintiff*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 BENEDICT SPANO, an individual,

10 Plaintiff,

11 vs.

12 LIBERTY MUTUAL INSURANCE COMPANY, a
13 Foreign Corporation; DOES I through X; and ROE
14 CORPORATIONS XI through XX, inclusive,

15 Defendants.

CASE NO.: 2:19-cv-02057-APG-NJK

**JOINT STIPULATION AND ORDER FOR
(14) DAY EXTENSION OF TIME FOR
PLAINTIFF'S RESPONSE TO
DEFENDANT'S PENDING MOTION TO
DISMISS PLAINTIFF'S COMPLAINT ECF
No.: [10]**

[SECOND REQUEST]

16 **COMES NOW**, Plaintiff, BENEDICT SPANO (hereinafter referred to as "Plaintiff"), by and
17 through his attorneys, the law firm of EDWARD M. BERNSTEIN & ASSOCIATES, and Defendant,
18 LIBERTY MUTUAL INSURANCE COMPANY (hereinafter "Defendant"), by and through his counsel
19 of record, Andrew C. Green, Esq. of KOELLER, NEBEKER, CARLSON & HALUCK, LLP, and
20 hereby submit this joint stipulation and proposed order to extend the deadline for Plaintiff's response to
21 the pending motion to dismiss by Defendant (ECF #7.) The parties previously requested the time for
22 Plaintiff to respond to the pending motion to dismiss Plaintiff's Complaint be extended by fourteen (14)
23 days (ECF #10.) At this time, the parties request the time for Plaintiff to respond to the pending motion to
24 dismiss Plaintiff's Complaint shall be extended by fourteen (14) days, so that any response by Plaintiff
25 would be due to the Court no later than January 16, 2020. The extension of time requested by the parties
26 herein is due to the parties' ongoing communications for potential resolution of the matter by non-judicial
27 means, and the extension requested herein is intended to permit the parties to complete their
28

1 communications in that regard prior to expiration of the extended deadline for Plaintiff to respond to the
2 motion to dismiss.

3 RESPECTFULLY SUBMITTED this 2nd day of January, 2020.

4
5 DATED this 2nd day of January, 2020.

6 KOELLER NEBEKER CARLSON
7 & HALUCK, LLP

DATED this 2nd day of January, 2020.

EDWARD M. BERNSTEIN & ASSOCIATES

8 By: /s/ Andrew C. Green
9 ANDREW C. GREEN, ESQ.
10 Nevada Bar No. 9399
11 400 S. 4th Street, Suite 600
12 Las Vegas, NV 89101
Attorneys for Defendant,
LIBERTY MUTUAL INSURANCE
COMPANY

By: /s/ Brian E. Lunt
BRIAN E. LUNT, ESQ.
Nevada Bar No. 11189
500 South Fourth Street
Las Vegas, NV 89101
Attorneys for Plaintiff,
BENEDICT SPANO

13
14 **ORDER**

15 Consistent with the foregoing stipulation, the parties' joint request to extend the time for Plaintiff
16 to respond to the pending motion to dismiss Plaintiff's Complaint (ECF #7) by fourteen (14) days IS
17 GRANTED. Any response by Plaintiff will be due to the Court no later than January 16, 2020.

18
19 
20 UNITED STATES DISTRICT JUDGE
21 Dated: January 2, 2020.
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

/s/ Alicia Lutz
 An Employee of
 EDWARD M. BERNSTEIN & ASSOCIATES